

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT NEW YORK**

ADVANCED ACCESS CONTENT SYSTEM
LICENSING ADMINISTRATOR, LLC,

Plaintiff,

v.

LANNY SHEN d/b/a DVDFAB AND
FENGTAO SOFTWARE INC., SUNREG
TECHNOLOGIES LTD. d/b/a DVDFAB AND
FENGTAO SOFTWARE INC., FENG TAO
d/b/a DVDFAB AND FENGTAO SOFTWARE
INC., SHEN XINLAN d/b/a AUDIO-DVD
CREATOR, and JOHN DOE, JANE DOE and/or
XYZ COMPANY d/b/a DVDFAB, RIPPERBLU-
RAY.COM, DVDFABB.COM and
DVDFFFAB.COM,

Defendants.

NO. 14-cv-1112 (VSB)

**SUPPLEMENTAL DECLARATION
OF MATTHEW HEWLETT IN
FURTHER SUPPORT OF
PLAINTIFF ADVANCED ACCESS
CONTENT SYSTEM LICENSING
ADMINISTRATOR, LLC'S
MOTION TO MODIFY THIS
COURT'S MARCH 4, 2014 ORDER
FOR PRELIMINARY INJUNCTION**

MATTHEW HEWLETT, under penalty of perjury, declares and says:

1. I am a private investigator licensed by the State of North Carolina and employed by Vaudra, Ltd. ("Vaudra"), a North Carolina-based investigation company. I have been employed as a private investigator, focusing on intellectual property infringement for the past ten years. I have been employed by Vaudra since October 2009. I have conducted and/or participated in approximately seven-hundred investigations involving intellectual property violations, including through Internet sales.

2. I submit this declaration on behalf of plaintiff Advanced Access Content System Licensing Administrator, LLC ("AACS LA" or "Plaintiff") in further support of AACS LA's motion to modify the Preliminary Injunction Order.

3. The following actions were undertaken by myself, or in conjunction with other Vaudra investigators. If called upon as a witness, I could testify to the following from personal knowledge and/or a review of Vaudra's business files.

4. As previously stated in paragraph 14 of my October 3, 2014 Declaration and shown in Exhibit D thereto, I have reviewed the registration information for Woookao.com and Woookao.cn. The websites associated with Woookao.com and Woookao.cn are both hosted at the IP address 58.96.169.157. Based on my experience, when there are a limited number of domain names on the same IP address, the domains are often connected by a common owner.

5. At the time of my October 3, 2014 Declaration in support of AACS LA's motion to modify the Preliminary Injunction Order, Woookao.cn was registered to the registrant email address peterzhang1211@yandex.com, which was also the registrant email address for Boooya.org. After AACS LA filed its motion, the registrant contact email address for Woookao.cn changed from peterzhang1211@yandex.com to dvdfabsuck@qq.com. Records showing the change in WHOIS registrant information for Woookao.cn are attached hereto as Exhibit A.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 4 day of November 2014 in Charlotte, North Carolina.



Matthew Hewlett